

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

**TIMOTHY TRIGG
ANGELA TRIGG**

PLAINTIFFS

VERSUS

CIVIL ACTION NO. 2:18-cv-00007

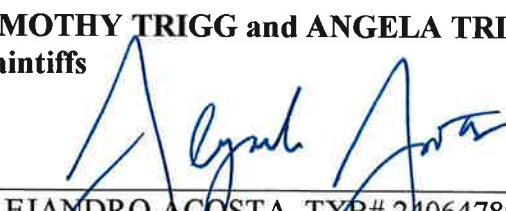
**PLATINUM LEVEL TRANSPORT, INC.;
ENTIMO E. CORADO MERIDA
and JOHN DOES 1-5**

DEFENDANTS

PLAINTIFFS' MOTION TO TRANSFER VENUE

Plaintiffs Timothy Trigg and Angela Trigg respectfully move the Court to transfer this case to the El Paso Division in the Western District of Texas. Venue cannot properly be laid in the Del Rio Division of the Western District of Texas under 28 U.S.C. § 1391(b)(1) because no party to this case resides in this Division, and venue is improper here under 28 U.S.C. § 1391(b)(2) because no substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in this Division. Therefore, pursuant to 28 U.S.C. § 1406(a), the Court may either dismiss this action or transfer it in the interest of justice to a division in which it could have been brought. Plaintiff requests that the Court transfer the action to the El Paso Division of the Western District of Texas, in which a substantial part of the events or omissions giving rise to the claim occurred (U.S.C.A. § 1391(b)(2)). Civil Action No. 2:18-cv-00007 Document 1 Filed 02/02/18 is appended hereto.

**TIMOTHY TRIGG and ANGELA TRIGG,
Plaintiffs**


ALEJANDRO ACOSTA, TXB# 24064789
SAMUEL S. MCHARD, TXB# 24095103
P. MANION ANDERSON, MSB# 104250, *Pro hac vice* pending
CORY N. FERRAEZ, MSB# 104770, *Pro hac vice* pending

ALEJANDRO ACOSTA, TXB# 24064789
FLORES, TAWNEY & ACOSTA, P.C.
801 Myrtle Ave, Suite 100
El Paso, TX 79901
Ph: (915)308-1000
Fx: (915)300-0283
Em: aacosta@ftalawfirm.com

SAMUEL S. McHARD, TXB# 24095103
P. MANION ANDERSON, MSB# 104250, *Pro hac vice* pending
CORY N. FERRAEZ, MSB# 104770, *Pro hac vice* pending
McHARD, McHARD, ANDERSON
& ASSOCIATES, PLLC
140 Mayfair Road, Suite 1500
Hattiesburg, MS 39402
Ph: (601) 450-1715
Fx: (601) 451-1719
Em: smchard@mchardlaw.com
manderson@mchardlaw.com
cferraez@mchardlaw.com